

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Executive Director

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March 10, 2025

VIA ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
March 10, 2025

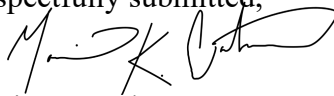
**Re: United States v. Foster Cooley
22 Cr. 651 (RA)**

Dear Judge Abrams:

I write on behalf of my client Foster Cooley to respectfully request that the Court modify the conditions of the bond to allow Mr. Cooley to travel to China – the specific details of his travel to be set by Pretrial Services – from late June 2025 to early July 2025 with his family for his brother’s college graduation from Peking University. The Government takes no position on this request, recognizing that the defendant has successfully completed the Young Adult Opportunity Program but still has very serious pending criminal charges that are presently being resolved between the parties. Per Officer Dominique Jackson, Pretrial Services has no objection to the request.

Mr. Cooley has remained on pretrial supervision since his arrest in 2022. Since then, Mr. Cooley has remained compliant with the terms of his supervised release and has successfully graduated from YAOP. Given Mr. Cooley’s history of compliance while under pretrial supervision, the defense requests Mr. Cooley be afforded permission to travel with his family to China.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ _____
Marisa K. Cabrera
Assistant Federal Defender
Tel.: (212) 417-8730

SO ORDERED:

HONORABLE Ronnie Abrams
United States District Judge

cc: Andrew Chan, Esq., Assistant United States Attorney
Dominique Jackson, Pretrial Services Officer